

Representation on the Woking Borough Council Local Development Framework Core Strategy Site Allocations Regulation 32 Consultation

Site Representation relating to Tegg's Lane/Randall's Field, Pyrford, Woking, Surrey

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Introduction

1. I am making this representation to support the Core Strategy and to object to the representations made by Pro Vision Planning & Design (PVD&P), on behalf of Burhill Estates Limited. I do so in my personal capacity, as a Pyrford resident, and in my professional capacity, as Director of Transport Planning Practice.
2. The PVD&P representation questions the soundness of the Core Strategy in respect of Woking Borough Council's assessment of Safeguarded Sites. In their view they believe that the Council has failed to take into consideration alternative sites in their assessment i.e. the Burhill Estates site at Tegg's Lane/Randall's Field. They request that, should it be recommended that alternative Safeguarded Sites be explored, this site should be considered for safeguarding for future development with consequential adjustments to the Green Belt boundary.
3. In their representation, they included, at Appendix 2, a "Constraints and Opportunities Analysis" which compared the sites at Brookwood Farm and Moor Lane (both currently excluded from the Green Belt) against the Randall's Field site (wholly within the Green Belt). They concluded that their site was "*in a more sustainable location*".
4. My representation will clearly show this statement to be untrue on the basis that the representations made by PVP&D were not founded on a robust and credible evidence base. I will demonstrate that the site does not meet relevant national planning policy guidance in respect of new residential developments being located in sustainable locations. As such their representations should be dismissed by the Inspector at the Examination in Public (EIP) into the Core Strategy as being unsound. The Core Strategy as prepared by Woking Borough Council should therefore stand unaltered.

Specific Comments upon PVD&P Representations

Planning Policy Background

5. Under Section 2 of their representations, PVP&D set the planning policy background in respect of national and regional Planning Guidance. They quote PPS1, PPG2, PPG3, PPS3 and PPG13 – one of the overarching themes covering all of these documents is that new communities should be located in sustainable locations with good access to public transport and suitably close to local services and facilities to encourage non-car modes of transport such as

walking and cycling. I set out below a few relevant quotes from their representations:

PPG2 - *"Safeguarded land should be located where future development would be ... well integrated with existing development and well related to public transport and other existing and planned infrastructure, so promoting sustainable development"*.

PPG13 - *"walking is the most important mode of travel at the local level and offers the greatest potential to replace short car trips, particularly under 2km"*.

They list PPG3 criteria against which LPA's should assess the suitability of sites for residential development, including:

"The location and accessibility of potential development sites to jobs, shops and services by modes other than the car, and the potential for improving accessibility"

This theme is continued in the replacement document, PPS3, which was published in November 2006 and takes effect from 1 April 2007, and I quote from paragraph 38: *"focusing new development in locations with good public transport accessibility and/or by means other than the private car"*.

6. However, having set this policy background, PVP&D then fail to adequately demonstrate in their representations how their site is compliant. One could surmise that this is probably because they recognise the shortcomings of the site and do not wish to draw attention to them. By contrast, I attached Appendix A which shows a Public Transport Accessibility Level (PTAL) assessment of the Randall's Field site.

Public Transport Accessibility Level (PTAL) Assessment

7. PTAL is a common tool used within my profession for assessing public transport accessibility within London; however it can also be used for sites within the Home Counties that are located on the periphery of the urban sprawl such as this one. PTAL is used for assessing the extent and ease of access of an area or site by public transport. It is widely used by the London Boroughs and is supported by Transport for London. PTAL is calculated by summing indices for bus, underground and rail to obtain an Index Number. The Index Numbers are compared with a banding regime to obtain a PTAL grade. Walk distance, number of services, frequency of services, walking speed and reliability of service are all used in the calculations. Standard specified thresholds and assumptions are used in the assessment. These include:
 - Pedestrians will typically walk a maximum of 12 minutes (960 metres) to reach a rail or Underground station;
 - The maximum walk time for a bus service is an 8 minute walk (640 metres);
 - The average walk speed is assumed as being 4.8km/h (80 metres per minute).
8. As can be seen from Appendix A, in the case of this site it attains a PTAL value of 1.22, which puts it into the lowest possible banding of 1a. This clearly

demonstrates just how poor the Randall's Field site is in respect of public transport accessibility. Also, from my experience, it is highly unlikely that bus operators would introduce additional services on the strength of the introduction of a site of this size.

Accessibility Assessment

9. I also attach Appendix B, which shows a far more accurate accessibility assessment of the site than that undertaken by PVP&D. I do not know whether they have intentionally attempted to mislead the Council in their representations or whether they have just been professionally incompetent, but you will see that their assessment is fundamentally flawed.
10. My Appendix B sets out the correct measurements for walk distances from the centre of the Randall's Field site to local services and facilities. These distances have been measured accurately using Google Earth; this is in stark contrast to those contained in Table 3 (paragraph 5.30) of Appendix 2 (Constraints & Opportunities Analysis) of the Core Strategy representations made by PVP&D on behalf of Burhill Estates.
11. The screen plots taken from Google Earth show the routes taken. In each case the walk path has been taken from the centre of the site out onto Tegg's Lane, where it is anticipated there would be a pedestrian access provided in the unlikely event that the site should ever be developed. The route then taken is the most direct to each of the services and facilities within the local area. By contrast, PVP&D took a postcode (GU22 8ST) for houses located on the north side of Tegg's Lane as the starting point for their walk paths, claiming that this was "*the nearest and most central point to the site*". As can be seen, this is clearly not the case.
12. Table 1 of the Appendix then compares the findings of this exercise to that undertaken by PVP&D. They claimed (paragraph 5.31 of their Appendix 2) that the Randall's Field site was within the recommended distances to services and facilities, as advised in the sustainable settlements document, in eight of eleven cases. In fact, their own document only showed this to be the case in seven cases. The truth, based upon this more accurate assessment, is that the site only meets the recommended distances in two out of the eleven cases, which clearly demonstrates that the site is in a highly unsustainable location. Therefore, contrary to PVP&D's conclusion that the Randall's Field site was "*in a more sustainable location*" when compared to the safeguarded sites, the opposite is in fact true. Randall's Field is in a more unsustainable location than the other two sites.

Conclusion

13. Following the 1988 Public Inquiry, the Inspector rightly concluded that the Randall's Field site should not be removed from the Green Belt. Woking Borough Council have no doubt paid due regard to that decision in not considering this site for safeguarding for future development whilst preparing their Core Strategy.
14. Since the 1980s, both central and local government planning policy has become focussed on sustainability issues. My representations clearly demonstrate that the Randall's Field site is in a highly unsustainable location with very poor public transport accessibility and, in the most part, with walk

distances to local services and facilities beyond those recommended by the sustainable settlements document.

15. Either intentionally or through poor research, PVP&D have made representations on behalf of Burhill Estates which are highly misleading. I would contend, on the basis of my own assessment, that their representations are founded on a robust and credible evidence base. As such, I put it to the Inspector at the Examination in Public (EIP) into the Core Strategy that their representations should be dismissed on the grounds that they are unsound. Therefore, in my opinion, the Core Strategy as prepared by Woking Borough Council should be declared sound and stand unaltered.